

Muddy Creek and Lake Creek Watershed Restoration Project: Notice of Proposed Action Content Analysis

Table information is based on IDT discussion 09/10/14 and subsequent analyses.

Commenters:

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| 1. Don Amador, Blue Ribbon Coalition
2. Brenda Gregg
3. Darryl Adams
4. Dennis & Samantha Keyser
5. Desi Rivera
6. Donald Wegner
7. D. Holmquist
8. Jon Wade | 9. Joseph and Judy Rinker
10. Justin Riggins
11. Kathryn and Pete Brophy
12. Ken Wilcox
13. Kevin Steinhour
14. Lyle Shingleton
15. Mark Bolenbaugh
16. Paul Gregg | 17. Ray Duvall, Albany Lodge (Late, no standing)
18. Robert Bruce
19. Robert Morrison
20. Ted Williams
21. Virgil and Carol Baker
22. Wyoming Game and Fish Department
23. Wyoming Department of Agriculture (Late, no standing) |
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Comment Code	Letter Number	Comment	How it is Addressed
I. Appropriate Management Strategies			
I.A. General			
I.A.1.	3, 4	It is imperative to manage and maintain a road and trail system for multiple uses of Forest Service lands.	As noted in the "Recreation" section of the environmental assessment, the Laramie Ranger District has a road and trail system in place and is currently expanding the off-highway vehicle trail system.
I.A.2.	1, 4	Managing a road as a trail or reclassification of a system road to a system trail are proven strategies that can help the agency achieve both resource protection and recreation goals and objectives.	As noted in the environmental assessment, alternatives B and C proposed converting National Forest System roads 553 and 588

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I.A.3.	10	It is necessary to maintain the existing roads and trails on the Forest. One cannot expect roads and trails to remain functional without maintenance. See the FS trail maintenance handbook.	to trails. Effects of alternatives B and C on resources in the project area (including recreation) are discussed in the “Environmental Impacts of the Proposed Action and Alternatives” section. Road and trail maintenance are discussed in the environmental assessment in the “Effects on Soil Resources” and “Effects on Transportation and Engineering” sections.
I.B. Road Closure:			
I.B.1.	2, 3, 10, 17	Management by closure is a poor option.	The management options for roads 553 and 588 discussed in the “Proposed Action and Alternatives” section of the environmental assessment. Closure is one management options considered for the two roads. Alternative A proposes continuing existing management. Alternative B proposes converting the two roads to motorized trails. Alternative C proposed converting the two roads to nonmotorized trails.
I.B.2.	10	Had the district focused on management of open trails and trail development instead of closures and obliteration following ESRTM, both roads would probably be far along in recovery.	The Eastern Snowy Range Travel Management focused primarily on user-created routes and roads from previous timber sales, which is why the decision included primarily route decommissioning. That decision did, however, approve development of motorized motorcycle and off-highway vehicle trail systems which have been and will continue to be developed.

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I.B.3.	3	Roads are important for fire lines and fire access.	<p>Since the roads in question are so close to the riparian area, the riparian area would act as a fire line in most circumstances. Circumstances that the riparian area would not act as a fire line would be extreme fire behavior associated with extreme drought. Under these circumstances, an 8-foot road is going to provide little fire suppression support since flame lengths under these conditions could be as much as 10 times the width of the existing road.</p> <p>The present condition of roads 553 and 588 would not allow an engine access to these areas. The roads are too rough and the base would be too soft, resulting in the engines getting stuck. Helicopter access would be the likely mode of transportation to these areas using natural and man-made openings to deploy fire suppression resources.</p>
I.C. Wet Weather or Seasonal Closure			
I.C.1	1, 4, 5, 10, 14, 20	Consider wet weather and seasonal closures.	<p>While a seasonal closure may be effective on the upland portions of the roads, approximately 73 percent (5.2 of 7.1 miles) of National Forest System roads 553 and 588 are located in the water influence zone and 2.2 miles are located directly in wetlands. The 2.2 miles of the roads located in wetlands rarely, if ever, dry out enough to be suitable for motorized traffic. See the hydrology specialist report on file in the project record.</p>

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I.D. Education and Signage			
I.D.1.	1, 4, 5, 17	Include a substantive signing program that will help educate the trail community regarding the import of staying on designated routes or respecting a seasonal closure so as to protect the long-term viability of continued access on said route(s). Post trail rules.	Medicine Bow National Forest personnel will follow standards included in the Forest Service trail handbook if the decision is made to manage the two roads as trails. Installation of signs is discussed in the “Effects on Transportation and Engineering” section of the environmental assessment.
I.E. Law Enforcement			
I.E.1.	2, 3, 5, 6, 7 16, 17	There should be more patrolling by law enforcement and higher fines for riding off the trail.	Law enforcement is outside of scope of project as the focus is on restoration and road conversion or decommissioning.
I.F. Funding and Volunteer Opportunities			
I.F.1.	1, 4, 5, 17	The FS should better utilize volunteers as a resource for road and trail maintenance and for seeking grant and funding opportunities. In addition, Many users will help monitor bad behavior and help correct if they realize it's to their advantage.	Volunteers are an excellent resource. Already, they contribute each year to recreation projects as well as botany, soils, and hydrology restoration projects and more. The Laramie Ranger District is currently expanding the off-highway vehicle trail system in cooperation with the Wyoming State Trails program (see the “Effects on Recreation and Access” section in the environmental assessment), and there may be opportunities to better utilize volunteer groups. This would be part of the Laramie District’s regular recreation program and may apply to these roads depending on the decision made. Setting a good example by staying on the trail and talking with other recreationists is a positive contribution from the off-highway vehicle community but cannot be

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			relied upon as a management technique. Costs for road design and maintenance are discussed in the “Effects on Transportation and Engineering” section of the environmental assessment.
II. Cause of Damage\II.A.General			
II.A.1.	6, 10, 13, 17	Most of the road damage is caused by Big 4WD vehicles with big tires or by people that are afraid to ride through muddy water such as in areas where the road has already been damaged.	Road and resource damage are discussed throughout the “Environmental Impacts” section of the environmental assessment.
II.A.2.	3, 6, 16	Much of the road damage is the result of natural weather events.	
II.A.3.	15, 16	The road condition is primarily the result of lack of maintenance by the FS.	
III. Recreation Opportunities			
III.A. General			
III.A.1.	2, 6	This area should remain accessible to all for a variety of recreational activities.	Access is addressed in the “Effects on Recreation and Access” section of the environmental assessment.
III.B. OHV			
III.B.1.	4, 17	These unique routes are important to the OHV community. OHV use should be given adequate consideration for recreation planning.	As noted in “Effects on Recreation and Access” section of the environmental assessment, the existing road and trail systems on the Laramie Ranger District and adjacent areas provide diverse recreation opportunities for the off-highway vehicle community.
III.B.3.	11	There are plenty of open roads on which to ride OHVs. These roads are not a necessary part of the road or trail system.	
III.C. Nonmotorized			
III.C.1.	22	There are not many hiking/biking/horse trails along stream courses on the MBNF outside of wilderness.	Alternative C proposes converting National Forest System roads 553 and 588 to nonmotorized trails as discussed in the “Proposed Action and Alternatives” section of the environmental assessment.

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III.D. Access for Older Adults and People with Disabilities			
III.D.1.	9, 14, 18, 19	Without vehicle access, many older adults and people with disabilities would not be able to access these areas.	Public motorized access, including access for older people and those with disabilities, is discussed in the following sections in the environmental assessment: Effects on Recreation and Access, Effects on Cultural Resources, and Effects on Mining. As noted in the recreation specialist report, motorized access is not a legislated right to every section of the Medicine Bow National Forest. Equestrian, foot, and nonmotorized wheeled travel will not be restricted by this action. There is no legal requirement to allow persons with disabilities to use over-snow vehicles or other types of motorized vehicles on roads, on trails and in areas closed to that use. Restrictions on motor vehicle use or over-snow vehicle use that are applied consistently to everyone are not discriminatory (Forest Service Manual 7715.79-2).
IV. Mining Access\IV.A. Legal			
IV.A.1.	3, 6, 9, 14, 18, 19, 21	By law, miners must have reasonable access to their claims.	Public motorized access, including access for mining claims, is discussed in the “Effects on Mining” section in the environmental assessment.
V. Watershed Restoration			
V.A. Habitat Benefits			
V.A.1.	22	Improving the riparian areas in the proposed area will benefit many wildlife species including mule deer.	Effects of the alternatives on wildlife are discussed in the environmental assessment in the “Effects on Wildlife” section.
V.B. Acceptable Uses			

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V.B.1.	8	I would like to try to make an ATV trail work, but if that isn’t feasible to restore the area, then Alternative D is the only acceptable course of action.	Comment only.
V.C. Techniques			
V.C.1.	14	Suggest using existing timber as barricades for very deep holes on the sides of roads.	Depending on the decision, these techniques may be considered or implemented. Invasive weeds will be considered during implementation of any alternative as required by the Forest Plan.
V.C.2.	14	Recommend leaving the current closure in place and let mother nature do some reclamation. This mining season, I have been pleasantly surprised to see how well things have progressed naturally.	
V.C.3.	22	Take precautions to limit spread of invasive weeds and aquatic species when completing restoration work.	
V.C.4.	22	WGFD identified Lake and Muddy Creeks as a concern for altered stream habitat due to road issues and lack of in-stream fish habitat such as woody debris and pools. Adding woody debris to streams would help diversity in-stream habitat for brook and brown trout and other nongame native fish species.	
V.C.5.	22	Restrict in-stream work or construction to the fall (9/15 to 11/15) to minimize impacts to trout spawning.	
VI. Forest Plan and NEPA Process			
VI.A. Forest Plan Goals and Objectives			
VI.A.1.	3, 6	The proposed alternatives do not satisfy Goal 2 of the Forest Plan and its objectives: provide a variety of uses, values, products, and services to people, including winter and summer non-motorized and motorized opportunities for a wide variety of uses and experiences consistent with other resource objectives; ensure that all applicable recreation facilities are available to people with disabilities, where off-road and off-trail resource damage is taking place, restore and protect these areas; provide a range of universally accessible opportunities, within the limits of the site characteristics, at all new or reconstructed developed recreation sites.	Not all uses and experiences are consistent with other resource objectives, and not all uses can be accommodated in all locations on the Medicine Bow National Forest. The interdisciplinary team evaluated the proposed action and three alternatives to address the need for change in the project area. See the “Need for the Proposal” and “Proposed Action and Alternatives” sections in the environmental assessment.

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VI.B. Range of Alternatives			
VI.B.1.	3, 6, 15,16, 19	Suggest add an alternative to repair the road and leave open as Level 2/Maintain as Level 2 with moderate restoration.	“Leave open as Level 2 Road” and “Maintain as Level 2 Road” are considered as the no action alternative. The responsible official could decide to add any level of restoration any alternative. Restoration options were analyzed and are within his decision space.
VI.B.2.	13	Suggest a 50” route on Muddy Creek and keep Lake Creek closed; this provides some needed OHV trail system, and Muddy Creek is more manageable than Lake Creek.	This is considered within the range of alternatives.
VI.B.3	23	The Wyoming Department of Agriculture is concerned the current proposal lacks the data and reason necessary for the proposed range of alternatives.	The proposal is based on the interdisciplinary team’s extensive field review; knowledge of road design and maintenance; and knowledge of stream and wetland restoration.
VI.C. Comment Period			
VI.C.1.	3, 6	Legal notice in Laramie Boomerang did not provide a level of publicity sufficient enough to notify all affected parties and the comment period should be extended.	The Forest Service posted the project to the schedule of proposed actions and the Medicine Bow-Routt website and sent letters directly to approximately 40 individuals, organizations, and State agency employees. Regulations do not allow for the comment period to be extended.
VI.C.2.	3, 6	The link to the proposal on the website was missing August 5-7 and the comment period should be extended.	Although one document link was broken, other project information, including contact information, was available. The environmental coordinator received one phone call and immediately fixed the broken link. There were still 20 days left in the comment period. Regulations do not allow for the comment period to be extended.

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VII. Livestock Grazing\VII.A.General			
VII.A.1.	22	Re-vegetate restored areas to minimize soil erosion and related aquatic impacts before grazing is allowed in the area. Prohibit livestock use of the area until monitoring shows it can support grazing.	Neither the 553 or 588 road is necessary for access to rangeland infrastructure in this allotment as there are several other roads in the area with a more frequent maintenance schedule.
VII.A.2.	23	We ask the LRD to analyze any impacts of road closures to for grazing permittees accessing adjacent grazing allotments.	
VIII. Other\VIII.A. General			
VIII.A.1.	5	I would like to know where ORV sticker money goes.	Outside scope of project.